## **REMARKS**

The Office Action of April 20, 2007, has been received and reviewed.

Claims 17-20, 23-34, and 70-98 are currently pending and under consideration in the above-referenced application. Each of claims 70-74, 76-86, and 88-98 has been rejected. Claims 17-20 and 23-34 have been allowed, and claims 75 and 87 are drawn to allowable subject matter.

Reconsideration of the above-referenced application is respectfully requested.

## Rejections under 35 U.S.C. § 103(a)

Claims 70-74, 76-86, and 88-98 have been rejected under 35 U.S.C. § 103(a) for being drawn to subject matter that is allegedly unpatentable over that taught in U.S. Patent 5,354,695 to Leedy et al. (hereinafter "Leedy"), in view of teachings from U.S. Patent 6,562,661 to Grigg (hereinafter "Grigg") and the subject matter taught in U.S. Patent 6,524,881 to Tandy et al. (hereinafter "Tandy").

The standard for establishing and maintaining a rejection under 35 U.S.C. § 103(a) is set forth in M.P.E.P. § 706.02(j), which provides:

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

It is respectfully submitted that a *prima facie* case of obviousness has not been established against any of claims 70-74, 76-86, and 88-98.

With respect to the subject matter recited in independent claim 70, it is respectfully submitted that none of Leedy, Grigg, or Tandy teaches or suggests a method that includes "molding a support structure on an active surface of a semiconductor substrate." Instead, the

teachings of Leedy are limited to securing a preformed structure to an active surface of a substrate (Col. 9, lines 6-14; FIG. 1f), while Grigg teaches the fabrication of stiffeners on a tape substrate by use of stereolithography processes (which do not comprise "molding"), and Tandy teaches securing a laser-markable tape to the backside 12 of a wafer 10 (Fig. 4A; col. 6, lines 44-49).

As for the subject matter to which amended independent claim 82 is directed, it is respectfully submitted that none of Leedy, Grigg, or Tandy teaches or suggests "securing [a] semiconductor substrate to a platen with [an] active surface facing the platen and *the support structure abutting* at least one surface or feature of or on *the platen*" and "removing material from a back side of the semiconductor substrate," which is supported by the support structure and the platen. Instead, the teachings of Leedy are limited to removing material from the back side of a substrate *before* a frame or ring is bonded thereto (col. 9, lines 6-14), Grigg lacks any teaching or suggestion with respect to removing material from a back side of a substrate, and Tandy teaches that material must be removed from the back side of a substrate before a laser-markable tape is secured thereto (col. 6, lines 44-49).

Furthermore, it is respectfully submitted that, without the benefit of hindsight provided by the claims of the above-referenced application, one of ordinary skill in the art wouldn't have been motivated to combine teachings from Leedy, Grigg, and Tandy in the manner that has been asserted. In particular, it is respectfully submitted that one of ordinary skill in the art would have no reason to substitute one of the frame or ring of Leedy, the stiffeners of Grigg, and the laser-markable tape of Tandy for another, particularly since none of these structures performs the same function as another.

For these reasons, it is respectfully submitted that the teachings of Leedy, Grigg, and Tandy do not support a *prima facie* case of obviousness against independent claim 70, independent claim 80, or any of claims 70-74 and 76-79 or 81-86 and 88-98 depending respectively therefrom.

## Allowable Subject Matter

The allowance of claims 17-20 and 23-34 and the indication that claims 75 and 87 recite allowable subject matter are gratefully acknowledged. Claims 75 and 87 have not been amended into independent form, as the claims from which they depend are believed to be allowable.

## **CONCLUSION**

It is respectfully submitted that each of claims 70-74, 76-86, and 88-98 is allowable. An early notice of the allowability of each of these claims is respectfully solicited, as is an indication that the above-referenced application has been passed for issuance. If any issues preventing allowance of the above-referenced application remain which might be resolved by way of a telephone conference, the Office is kindly invited to contact the undersigned

Respectfully submitted,

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